

EXHIBIT D

Gannon, Kevin

From: Seeve, Brian
Sent: Tuesday, May 31, 2022 12:59 PM
To: Anant.Saraswat@WolfGreenfield.com; Singular
Cc: kvpsingular@keker.com; WGS-Singularv.Google@WolfGreenfield.com; mkwun@kblfirm.com; Asim Bhansali
Subject: Re: Printing of Source Code

Counsel,

Now that the stay has been lifted and litigation is once again underway, I write to renew Singular's request for printouts of the source code below. Please provide the requested printouts by Friday, June 3.

Singular notes that Google has objected to printing five of the files listed below because they are more than 25 pages in length. As you know, the Protective Order specifically allows the printing of files longer than 25 pages with "good cause or prior approval, which shall not be unreasonably withheld." Singular maintains that there is good cause for Google to provide printouts of the requested files that are longer than 25 pages; these files relate to the [REDACTED] in the accused TPU v2 and TPU v3 products. As Google is aware, the [REDACTED] is highly relevant to this case, and was specifically identified in Singular's Infringement Contentions as meeting one or more of the limitations of the asserted claims. The fact that the code relating to the [REDACTED] happens to be located in a few long source code files should not prevent Singular from obtaining meaningful discovery about its core theories.

To the extent Google still objects to providing printouts of a particular file or files, please let us know when Google is available to meet and confer regarding its objections. In the meantime, please provide printouts of the remainder of the requested files by June 3.

Best,

Brian